



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT ONSITE TREATMENT

PERMIT #: _____

DATE: ____/____/____

PAGE: _____ OF _____

BUSINESS ADDRESS: _____ ZIP: _____

UNIT COUNT:	PBR	CA	CESW	CESQT	CEL	TOTAL	GENERATOR STATUS:			
UNIT Numbers							<input type="checkbox"/> CESQG	<input type="checkbox"/> SQG	<input type="checkbox"/> LQG	
VIOLATION REPORT: This checklist and inspection report identifies violations of State law regarding onsite treatment of hazardous waste. A checkmark (✓) under the column marked (V) indicates a violation of the law. Violations are explained in more detail on the attached inspection sheets. The governing laws and regulations are found in the Health and Safety Code (HSC) and Title 22 of the California Code of Regulations (22 CCR). All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use the Corrective Action Form to document your return to compliance. Your Specialist can provide these forms. Please call (619) 338-2222 or your Specialist if you have any questions.										
VIOLATION DESCRIPTION										
#	ALL TIERS						Status	VIOL	V	NA
	Unauthorized treatment of hazardous waste. {All tiers 25201(a) Additionally, CESW/SQT: 25201.5; CEL: 25201.14; CA: 25200.3; PBR: 67450.1}							1701		
	Onsite Hazardous Waste Treatment Notification pages (facility, unit & treatment process pages) not complete, accurate and/or on file with CUPA. {CE: 25201.5(d)(7) & 25201.14(c)(2); CA: 25200.3(e)(1); PBR: 67450.2(b) & 67450.3(c)}							1702		
	Treated hazardous wastes were not generated onsite. {CE: 25201.5(d)(1); CEL: 25201.14(c)(1); CA: 25200.3(c)(8); PBR: 67450.3(c)(6)}							1703		
	Number of <input type="checkbox"/> tanks, <input type="checkbox"/> containers, and/or <input type="checkbox"/> treatment processes is not correct for each treatment unit. {CE: 25201.5(d)(7)(C) and 25201.5(a) & (c); CEL: 25201.14(a); CA: 25200.3(a) & (e)(3); PBR: 67450.2(b)(3)(G), 67450.3(c)(4) & 67450.11}							1704		
	Estimated/actual monthly treatment volume is not appropriate for the indicated tier(s). {CE: 25201.5(a) & (d)(7)(C); CEL: 25201.14(c); CA: 25200.3(b)(1) & (e)(3); PBR: 67450.2(b)(3)(G) & 67450.11}							1705		
	<input type="checkbox"/> Waste identification, <input type="checkbox"/> waste type, and/or <input type="checkbox"/> treatment method not correct for the tier(s) indicated. {CE: 25201.5; CEL: 25201.14(a); CA: 25200.3; PBR: 67450.3(c)(4) and 67450.11}							1706		
	Number of onsite treatment units is not the same as the number notified. {CE: 25201.5(d)(7), 25201.5(i) & 25201.14(c); CA: 25200.3(e) & (k); PBR: 67450.2(b) & 67450.3(c)}							1707		
	Residuals management information not adequate or noted correctly on notification form. {CE: 25201.5(d)(7)(C)(iv) & (d)(6); CEL: 25201.14(c)(1); CA: 25200.3(b)(4) & (e)(3)(D); PBR: 67450.3(c)(5)}							1708		
	Indicated basis for not needing a federal permit is incorrect. {CE: 25201.5(d)(7) & CEL: 25201.14(c)(1); CA: 25200.3(e)(3)(C); PBR: 67450.2(b)(3)(G) & 67450.11}							1709		
	Site map/plot plan does not adequately show the location of all regulated treatment units. All FTUs: Title 19 CCR section 2729.2(a)(3) & {CE: 25201.5(d)(7); CA: 25200.3(e); PBR: 67450.2(b)(3)(B)}							1710		
	Inadequate or no onsite written inspection schedule for containers, tanks, & equipment (must include inspections for safety equipment, emergency & security devices, specify problems checked for, and frequency of inspections). {For containers-CE: 25201.5(d)(4)&(5); CEL: 25201.14(c)(1); CA: 25200.3(c)(5); PBR: 67450.3(c)(8)(B) & 67450.3(c)(9)(A) & (D); 66265.15} {For tanks, also 66265.195}							1711		
	Inadequate or no onsite records/logs of inspections conducted (must include dates, times, name of inspector, observations, and specifics of any needed repairs or corrective actions). (3 years for CE and PBR units, 5 years for CA). {CE: 25201.5(d)(4)&(5), 25201.14(c)(1); CA: 25200.3(c)(5)&(7); PBR: 67450.3(c)(8) & (9)(A) & (D), 66265.73(a)&(b)(1); 66265.15(b) & (d)}							1712		
	Facility does not meet all POTW industrial waste discharge requirements, as applicable, or is missing records of such (keep 5 years for CA tier). {CE: 25201.5(d)(6); CEL: 25201.14(c)(1); CA: 25200.3(c)(7); PBR: 67450.3(c)(5)(A)}							1713		
	Improper/inadequate closure of treatment unit (closure includes removal or decontamination of equipment, waste residues, containment systems, soils and/or structures). {CE: 25201.5(d)(8)(A); CEL: 25201.14(c)(1); CA: 25200.3(g)(1); PBR: 67450.3(c)(11)}							1714		
	Notification was not made to CUPA after treatment unit closure requirements were met. {CE: 25201.5(d)(8)(B); CEL: 25201.14(c)(1); CA: 25200.3(g)(2); PBR: 67450.3(c)(11)} Note: for PBR, notification must be made 15 days BEFORE completion of closure							1715		
	Inadequate or no written operating instructions for treatment unit (must include for every unit: how to operate unit, how to perform waste treatment, and how to manage residuals AND records of the dates, volumes, and types of wastes treated). Records must be kept 3 years for CE; 5 years for CA; or until closure for PBR unit. {CE: 25201.5(d)(3)&(5); CEL: 25201.14(c)(1); CA: 25200.3(c)(6) & (7); PBR: 67450.3(c)(9)(D) and 66265.73(a) & (b)(1)}							1716		
	Treatment not being done in tanks or containers (primary containment equipment). {CA: 25200.3(b)(2); PBR: 67450.11(a); CE: 25201.5(d)(9); CEL: 25201.14(c)(1)}							1717		
	CEL only: Improperly treating contaminated groundwater, gasoline, or >2% diesel-contaminated water in oil-water separator unit. {25201.14(b) & (c)(3)}							1718		

SIGNATURE OF BUSINESS REPRESENTATIVE

DATE SIGNED

TITLE OF BUSINESS REPRESENTATIVE



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VIOLATION DESCRIPTION

#	CONDITIONALLY AUTHORIZED ONLY	Status	VIOL	V	NA
	Conditionally authorized notifier improperly treating: <input type="checkbox"/> in excess of volume limit, <input type="checkbox"/> a waste stream that is hazardous for >1400 ppm (total inorganics) and/or <input type="checkbox"/> a waste stream that is hazardous for two or more characteristics. {HSC 25200.3(a)(1) & (9), (b)(1)}		1731		
#	CONDITIONALLY AUTHORIZED AND PERMIT BY RULE ONLY	Status	VIOL	V	NA
	Proper secondary containment is not provided or is <u>not</u> : <input type="checkbox"/> compatible with stored waste, <input type="checkbox"/> free of cracks & leaks, <input type="checkbox"/> protecting containers from contact with accumulated liquid, <input type="checkbox"/> capable of containing a 24 hour/25 year storm precipitation plus 10% volume of all containers, or 100% largest container volume, whichever is greater. {Containers: 66264.175(a) & (b) for CA per HSC 25200.3(c)(4). For PBR: 67450.3(c)(9)} {Tank systems: 66265.193 and .194}		1741		
	Facility has not obtained a written statement/assessment signed by an independent, California registered professional engineer (PE) certifying that tank system and secondary containment for tanks or containers meet all the design requirements of Title 22 CCR. For the CA tier, treatment in "containers" does not require a written statement signed by a PE for the containment area. {66264.175(c); & 66265.190 through 66265.202; PBR: 67450.3(c)(9) and (12); For CA 25200.3(c)(4)}		1742		
	Security is not provided via 24 hour controlled entry & warning signs for this facility where unauthorized or unknowing entry could cause injury or violation. {66265.14; CA: 25200.3(c)(1); PBR: 67450.3(c)(9)(A)}		1743		
	Phase I site assessment checklist not completed & filed (with DTSC) within one year of being authorized to operate unit. {CA: 25200.3(c)(3); PBR: 67450.7(a)(3); 25200.14(b)(1)}		1744		
	Annual waste minimization certification not properly completed/submitted to CUPA (must outline waste minimization program -as economically feasible- and state that treatment is in accordance with waste minimization program). {CA units: 25202.9 & 25200.3(c)(2); PBR 66262.45(c)}		1745		
	Financial assurance not obtained, not updated annually or inadequate for sum of closure cost estimates using appropriate mechanism (i.e. trust fund, surety bond, insurance, self-certification) showing each unit's estimated closure costs. {67450.13; 66265.143} Requires submittal of UPC form, "Certification of Financial Assurance per 67450.13(b)"		1746		
#	PERMIT BY RULE ONLY	Status	VIOL	V	NA
	PBR notification not renewed/added annually (due by January 1) or sooner {if significant change(s) occurred}. {67450.3(c)(1) & (c)(2)}		1751		
	Exterior of treatment unit was not permanently marked with facility ID number, an individual serial number, and name of the owner/operator. {67450.3(c)(7)}		1752		
	Written waste analysis plan does not exist or is inadequate in specifying parameters of analysis, testing methods, frequency of analysis and sampling methods used to obtain representative samples. {66265.13(b) & 67450.3(c)(9)(A)}		1756		
	Facility does not have an adequate written closure plan (plan must specify how & when each unit will be closed, equipment decontamination steps & procedures, expected year of closure, and estimated time required to close each unit). {67450.3(c)(11)}		1757		
	All hazardous waste was not removed within 90 days of last treatment in accordance with the unit's closure plan. {67450.3(c)(11)(D)}		1758		
	All closure activities were not completed within 180 days after final treatment. {67450.3(c)(11)(E)}		1759		
	Notification was not made to the CUPA 15 days prior to completion of closure. {67450.3(c)(11)(F)}		1760		
	Certification signed by the owner/operator <u>and</u> a California registered, independent professional engineer was not submitted to the CUPA notifying that closure has been completed per the closure plan. {67450.3(c)(11)(G)}		1761		

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